

## David Henkin

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**From:** Katkow, Mark CIV 25ID L OSJA [mark.katkow@us.army.mil]  
**Sent:** Wednesday, December 06, 2006 7:57 PM  
**To:** David Henkin  
**Cc:** Barry.Weiner@usdoj.gov; Harry.Yee@usdoj.gov; Lewis, Robert M Mr OTJAG; James.Gette@usdoj.gov  
**Subject:** RE: Follow-up from Borne Deposition (UNCLASSIFIED)  
**Signed By:** There are problems with the signature. Click the signature button for details.

Classification: UNCLASSIFIED

Caveats: NONE

David,

I am sending this on behalf of Mike Lewis. Responses are listed below each of your queries.

v/r

Mark

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-----Original Message-----

**From:** David Henkin [mailto:dhenkin@earthjustice.org]  
**Sent:** Tuesday, December 05, 2006 3:53 PM  
**To:** Lewis, Robert M Mr OTJAG; James.Gette@usdoj.gov  
**Cc:** Katkow, Mark CIV 25ID L OSJA; Barry.Weiner@usdoj.gov; Harry.Yee@usdoj.gov  
**Subject:** Follow-up from Borne Deposition

Gentlemen,

Pursuant to our agreement at Ron Borne's deposition yesterday, I have started to pull together the questions related to items listed in our 30(b)(6) deposition notice that Mr. Borne was unable to answer and had indicated that individuals other than Col. Banach would have the requested information. Based on Mike's representation last night, I thought I would

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have more time before Ane Bakutis' deposition to pull together a complete list. As it happens, I did not.

In the interest of moving this forward, I am providing below a list of the questions I have pulled to date from my notes from the Borne deposition. Should I identify other questions (or should your notes reflect other questions) requiring input from individuals other than Col. Banach, I will send them to you as soon as I identify them. For now, here are the initial questions:

1. With respect to Range 11T at Pohakuloa Training Area:

A. If, during the week of December 18, 2006, the district court were to lift the injunction on construction activities at Range 11T, what is the earliest date the range would be ready to conduct the proposed training with the Mobile Gun System ("MGS")?

Response: First week of May 2007.

B. To date, how much has the Army spent on construction at Range 11T for the range modifications for the proposed training with the MGS?

Response: \$0.

C. If the district court were to lift the injunction on construction activities at Range 11T, how much would it cost the Army complete construction on the range modifications for the proposed training with the MGS?

Response: Approximately \$1,362,800.00

2. With respect to the Schofield Barracks Motor Pool, if, during the week of December 18, 2006, the district court were to lift the injunction on construction activities at the Motor Pool, what is the earliest date the Motor Pool would be completed with respect to allowing use of:

A. The parking areas?

Response:

Eastern half of the main parking area: Approximately 9 Feb 07

Western half of the main parking area: Approximately 31 May 07

POV parking area: Approximately 10 Jul 07

B. The maintenance facilities?

Response: Approximately 18 Feb 08.

3. With respect to the Multiple Deployment Facility, how much of the

cost is attributable to:

A. The heavy vehicle scales required to weigh Strykers?

Response: Approximately \$1,130,000.

B. The munitions loading pads required to load Stryker vehicles for deployment?

Response: No cost. Contrary to our prior understanding, new munitions loading pads were in the initial design plans for the MDF but later deleted. The Army will utilize currently existing loading pads at the current Ammunition Supply Point and Ammunition Holding Area.

In addition, Mr. Borne referenced some documents that should have been part of the Army's production last Friday. To date, I have identified the following categories (with notation of the relevant request for production. Please provide these documents prior to Col. Banach's deposition:

1. Produce all documents related to the decision to eliminate the use of the MK19 at KR-3 (RFP #8).

Response: Still searching for responsive documents.

2. Produce all documents showing the location of new firebreak road at Schofield Barracks (RFP #6).

Response: Documents provided via hand delivery on 12/6/06 (REC for Road Restoration, QTR1 with associated documents and 5 maps/photos of proposed firebreak).

Aloha, David

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